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*Attorneys for Defendant Salvasen Health*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MICHELLE FERREIRA	)	CIVIL ACTION FILE
	)	NO. 2:22-cv-02648-MCA-MAE
Plaintiff,	)	
	)	Motion Day: July 18, 2022
V.	)	
	)	<b>ORAL ARGUMENT</b>
SALVASEN HEALTH,	)	<b>REQUESTED</b>
BLACKHAWK CLAIMS	)	
SERVICES, JOHN DOES 1-10 And	)	<b><i>DOCUMENT ELECTRONICALLY</i></b>
XYZ CORPS., 1-10	)	<b><i>FILED</i></b>
	)	
Defendants.	)	

**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that on July 18, 2022 at 9:00 a.m., or such other date and time set by the Court, Defendant Salvasen Health shall move this Court, before the Honorable Madeline Cox Arleo, U.S.D.J., in Room MLK 4A, Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, N.J., 07101, for an Order dismissing Plaintiff's Michelle Ferreira's Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(6), 9(b) with prejudice for lack

of personal jurisdiction and failure to state a claim upon which relief can be granted, and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that in support of the within motion, Salvasen Health will rely upon the accompanying Brief in support with all pleadings on file in this matter. A Proposed Order is also submitted herewith.

Dated: New York, New York  
June 20, 2022

MORITT HOCK HAMROFF LLP

/s/ James P. Chou

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